

## The Honorable James L. Robart

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

RICHARD L. WENDT REVOCABLE  
LIVING TRUST dated March 8, 1995, by  
Trustee Roderick Wendt,

Plaintiff,

V.

CHURCHILL & COMPANY2 LLC, a Washington limited liability corporation.

Defendant.

No. 3:23-cv-05359-JLR

**STIPULATED MOTION AND  
[PROPOSED] ORDER  
REGARDING DEADLINE FOR  
MOTIONS RELATED TO  
DISCOVERY**

**Note on Motion Calendar:  
July 31, 2024**

Plaintiff the Richard L. Wendt Revocable Living Trust dated March 8, 1995, by Trustee Roderick Wendt (“the Trust”) and Defendant Churchill & Company2 LLC (“Churchill”) (the Trust and Churchill collectively, “the Parties”) jointly request that the Court grant a short extension of the deadline for motions related to discovery. The Parties have had productive discussions relating to discovery issues, but some issues remain unresolved. The Parties do not wish to burden the Court with motions on issues that may soon be resolved. At this time, the Parties are not requesting a continuance of the trial date or other pre-trial deadlines as established in the Order Setting Trial Dates & Related Dates (Dkt. No. 20).

STIPULATED MOTION AND [PROPOSED] ORDER RE:  
DEADLINE FOR MOTIONS RELATED TO DISCOVERY  
No. 3:23-cv-05359-JLR - Page 1



ARÊTE LAW GROUP

1210 THIRD AVE. STE 210

218 THIRD AVE., STE 2  
SEATTLE WA 98101

SEATTLE, WA 98101  
(206) 428-3250

1       The Parties request that the deadline for motions related to discovery, now set for  
2       August 5, 2024, be extended to August 15, 2024.

3  
4       DATED: July 31, 2024.

5       **ARETE LAW GROUP PLLC**

6       By: /s/ Jeremy E. Roller

7       Jeremy E. Roller, WSBA No. 32021  
8       1218 Third Avenue, Suite 2100  
9       Seattle, WA 98101  
10      Phone: (206) 428-3250  
11      Fax: (206) 428-3251  
12      [jroller@aretelaw.com](mailto:jroller@aretelaw.com)

13  
14      *Attorneys for Plaintiff Richard L. Wendt*  
15      *Revocable Living Trust*

16       **SELBY MORGAN & BORN, PLLC**

17       By: /s/ L. Clay Selby

18       L. Clay Selby, WSBA No. 26049  
19       Stuart C. Morgan, WSBA No. 26368  
20       1019 Regents Blvd., Suite 103  
21       Fircrest, Washington 98466-6037  
22       Phone: (253) 446-8610  
23       Fax: (253) 327-1700  
24       [clay@smb-lawyers.com](mailto:clay@smb-lawyers.com)  
25       [stu@smb-lawyers.com](mailto:stu@smb-lawyers.com)

26  
27      *Attorneys for Defendant Churchill &*  
28      *Company2 LLC*



## [PROPOSED] ORDER

IT IS SO ORDERED. The deadline for motions related to discovery is extended to August 15, 2024. The trial date and other pre-trial deadlines remain as set in the Order Setting Trial Dates & Related Dates (Dkt. No. 20).

DATED: August 1, 2024

Hon. James L. Robart  
United States District Judge